

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

RUSSELL ZINTER; ET AL.

Plaintiffs,

v.

CHIEF JOSEPH SALVAGGIO; ET AL.

Defendants.

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CIVIL NO. SA-18-CA-680-FB

JOINT MOTION FOR CONFIDENTIALITY AND PROTECTIVE ORDER

TO THE HONORABLE UNITED STATES DISTRICT COURT

COME NOW PLAINTIFFS and DEFENDANTS (collectively “the Parties”) and file this Joint Motion for Confidentiality and Protective Order requesting that this Court grant this motion, and in support would show the Court as follows:

1. Plaintiffs are RUSSELL ZINTER; JACK MILLER; BRIAN HOWD; JAMES A. MEAD; JOSEPH BRANDON PIERCE; MARK BROWN; DAVID BAILEY; JUAN GONZALES JR.; KEVIN EGAN; JONATHAN GREEN; and JAMES SPRINGER (“Plaintiffs”).
2. Defendants are CHIEF JOSEPH SALVAGGIO; LIEUTENANT DAVID ANDERSON; DEPUTY JANE DOE GOLDMAN; OFFICER JOHNNY VASQUEZ; CPL. CHAD MANDRY; SERGEANT JOHN DOE; OFFICER JIMMIE WELLS; CORPORAL LOUIS FARIAS, badge 534; OFFICER BRANDON EVANS, badge 556; OFFICER UZIEL HERNANDEZ; JOHN DOE TAZER 1; JOHN DOE TAZER 2 (“Individual Defendants”); and THE CITY OF LEON VALLEY, a political Subdivision of the State of Texas (“City”) (collectively referred to as “Defendants”).

3. Defendants seek to protect and keep confidential Defendants' answers and responses, to Plaintiffs' Interrogatories; Requests for Production; Requests for Admission; Deposition on Written Questions; Rule 26 Disclosures; exhibits; affidavits; video and audio deposition testimony; and video and non-video deposition transcripts of the Individual Defendants; and representatives and employees of the City.

4. Defendants seek to protect and keep confidential the above-referenced Defendants' answers and responses from the dissemination; publication; posting; broadcasting; referencing; and copying on the internet and other electronic and broadcast media, social media platforms, to include: YouTube, and Plaintiffs' and Third Parties' internet, cell phones, publications, video cameras, pictures, and social media accounts. The confidentiality and protective order is sought to protect sensitive and private information of police officers; city officials, city employees, and confidential information of criminal investigations, arrests and convictions of third parties from disclosure, dissemination, and publication on the internet; electronic and broadcast media; social media platforms; and through written documents or information contained in a written document.

5. The Parties have conferred and agree to the matters listed in the Confidentiality and Protective Order and request that this Court enter and make a part of the record in this case for all purposes the attached Confidentiality and Protective Order.

PRAYER

The Parties request that the Court grant the Parties' Joint Motion for Confidentiality and Protective Order and enter and make a part of the record in this case for all purposes the attached Confidentiality and Protective Order, and for such other and further relief to which the Parties may be justly entitled.

SIGNED this 28th day of October, 2020.

Respectfully submitted,

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